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6			
7	RICHARD DOYLE, City Attorney (#88625)  NORA FRIMANN, Chief Trial Attorney (#932	49)	
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10	Facsimile Number: (408) 998-3131 E-Mail Address: cao.main@sanjoseca.gov		
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12	ROBERT DAVIS		
13	TIMOTHY KRAL (#200919) Manning & Marder, Kass, Ellrod, Ramirez LLP		
14	660 S. Figueroa Street, 23rd Floor Los Angeles, CA 90017 Telephone Number: (213) 624-6900		
15			
16	Facsimile Number: (213( 624-6999 E-Mail Address: tjk@mmker.com		
17			
18	Attorneys for TASER INTERNATIONAL, INC.		
19	UNITED STATES DISTRICT COURT		
20	NORTHERN DISTRICT OF CALIFORNIA		
21	SAN JOSE DIVISION		
22	NOREEN SALINAS,	Case Number: C08-02625 RS	
23	Plaintiff,	SECOND STIPULATION AND	
24	V.	[PROPOSED] ORDER MODIFYING INITIAL CASE MANAGEMENT	
25	CITY OF SAN JOSE, CHIEF ROBERT	SCHEDULE	
26	DAVIS, TASER INTERNATIONAL, INC., and DOES 1 TO 10, inclusive,		
27	Defendants.		
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Dated: September 3, 2008.

Dated: September 3, 2008

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Plaintiff in the above-entitled action, Noreen Salinas, and Defendants City of San Jose, Chief Robert Davis, and Taser International, Inc., hereby stipulate to a partial modification of the Court's Order setting Initial Case Management Conference and ADR deadlines in this matter, filed on May 23, 2008. These parties request that the Court adopt this Stipulation and enter an Order thereon.

These parties stipulate that the Initial Case Management Conference in this matter be rescheduled to October 15, 2008, at 2:30 p.m., and that the last day to file a Case Management Statement be continued to October 8, 2008. The parties further stipulate that their last day to file a Rule 26(f) report, complete disclosures, or state objection in Rule 26(f) report be extended to a date which is mutually convenient to all counsel, but in no event later than 14 days following the Initial Case Management Conference.

In support of this stipulation, the parties submit that counsel for Defendant Taser International, Inc., has been assigned the defense of that Defendant and is still in the process of reviewing and evaluating the complaint in this matter. In addition, the parties seek additional time to jointly discuss this case in order to prepare a meaningful Case Management Statement.

Respectfully submitted.

By:

Attorney at Law

Attorney for Plaintiff NOREEN SALINAS

RICHARD DOYLE, City Attorney

Bv: Sr. Deputy City Attorney

Attorneys for Defendants CITY OF SAN JOSE and ROBERT DAVIS

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1 2	Dated: September 3, 2008	MANNING & MARDER, KASS, ELLROD, RAMIREZ, LLP	
3		By: <u>/S/</u> TIMOTHY J. KRAL	
4		TIMOTHY J. KRAL	
5		Attorneys for Defendant	
6		TASER INTERNATIONAL, INC.	
7		NDDED	
8	ORDER  Pursuant to the Stipulation of Plaintiff Noreen Salinas and Defendants City of San Jos		
9	Chief Robert Davis, and Taser International, Inc.:  IT IS HEREBY ORDERED that the Initial Case Management Conference in this matter is rescheduled to October 15, 2008, at 2:30 p.m., and that the last day to file a Case Management Statement is continued to October 8, 2008.  IT IS FURTHER ORDERED that the last day for the parties to file a Rule 26(f) report, complete disclosures, or state objection in Rule 26(f) report be extended to a date which is		
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15	mutually convenient to all counsel, but shall not be later than 14 days following the Initial Case		
16	Management Conference.		
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18	Dated:	<del></del>	
19		RICHARD SEEBORG United States Magistrate Judge	
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